

1 [Submitting Counsel below]
2
3
4
5
6
7

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

10 This Document Relates to:
11 ALL CASES

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

13
14 **TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

15 Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider
16 whether certain materials should be sealed. Plaintiffs file these materials under seal out of an
17 abundance of caution because they contain references to documents produced and marked
18 confidential by Uber.

19 **Material To Be Filed Under Seal**

20 The materials to be filed under seal are portions of the parties' Joint Dispute Letter re:
21 TAR Validation. Plaintiffs request the Court consider whether the following should be filed under
22 seal:
23
24
25
26
27
28

Document	Description	Designating Party
Portions of the parties' Joint Letter Brief re: TAR Validation	References to information marked Confidential	Uber

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must "file a statement and/or declaration as described in subsection (c)(1)" of the Local Rules. None of the information at issue was marked confidential by Plaintiffs. Pursuant to the Court's order at Dkt. 1559, Uber must file its statement within one day.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Roopal P. Luhana in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: January 28, 2025

Respectfully submitted,

By: /s/ Roopal P. Luhana

Roopal P. Luhana

CHAFFIN LUHANA LLP

600 Third Avenue, 12th Floor
New York, NY 10016
Telephone: (888) 480-1123
Facsimile: (888) 499-1123
luhana@chaffinluhana.com

By: /s/ Sarah R. London

Sarah R. London (SBN 267093)

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

1 slondon@lchb.com
2

3 By: /s/ Rachel B. Abrams
4

5 Rachel B. Abrams (SBN 209316)
6

7 **PEIFFER WOLF CARR KANE**
8 **CONWAY & WISE, LLP**
9 555 Montgomery Street, Suite 820
10 San Francisco, CA 94111
11 Telephone: (415) 426-5641
12 Facsimile: (415) 840-9435
13 rabrams@peifferwolf.com
14

15 *Co-Lead Counsel for Plaintiffs*
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **CERTIFICATE OF SERVICE**

2 I hereby certify under penalty of perjury that on January 28, 2025, I authorized the
3 electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system,
4 which will send notification of such filing to registered parties.

5
6 */s/Roopal Luhana* _____
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28